

1 KELLER BENVENUTTI KIM LLP
2 Jane Kim (#298192)
(jkim@kbkllp.com)
3 David A. Taylor (#247433)
(dtaylor@kbkllp.com)
4 Thomas B. Rupp (#278041)
(trupp@kbkllp.com)
5 425 Market Street, 26th Floor
San Francisco, CA 94105
Tel: 415 496 6723
Fax: 650 636 9251

ROVENS LAMB LLP
STEVEN A. LAMB (SBN 132534)
slamb@rovenslamb.com
Telephone: (310) 536.7830
Facsimile: (310) 872.5489
2601 Airport Drive, Suite 370
Torrance, California 90505

LAW OFFICES OF JENNIFER L. DODGE INC.
Jennifer L. Dodge (#195321)
(jdodgelaw@jenniferdodgelaw.com)
2512 Artesia Blvd., Suite 300D
Redondo Beach, California 90278
Tel: (310) 372.3344
Fax: (310) 861.8044

10 *Attorneys for Debtors and Reorganized Debtors*

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12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

14
15 **In re:**

16 **PG&E CORPORATION,**

17 **- and -**

18 **PACIFIC GAS AND ELECTRIC**
19 **COMPANY,**

- 20
- 21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24 * *ALL PAPERS SHALL BE FILED IN THE*
25 *LEAD CASE, NO. 19-30088 (DM)*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**PG&E'S EVIDENTIARY OBJECTIONS IN
OPPOSITION TO CLAIMANT'S PARTIAL
MOTION FOR SUMMARY JUDGMENT
AND REPLY TO PARTIAL MOTION FOR
SUMMARY JUDGMENT**

Date: December 19, 2023
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Pursuant to the Federal Rules of Evidence, Debtors PG&E Corporation and Pacific Gas and
2 Electric Company hereby object to the declarations and exhibits submitted in support of Claimant's
3 Reply in Support of Claimant's Motion for Partial Summary Judgment:

4 *Declaration of Amir Shahmirza in Support of Reply to Motion for Partial Summary Judgment*
5 [Docket No. 14157-1]

Paragraphs 4 and 5, at 2:16-3:23 and Exhibit C thereto.	<p>FRE 602, Lacks Foundation/Personal Knowledge; FRE 801, Hearsay. This is hearsay by Claimant Shahmirza within hearsay by "Jason." Although Claimant identifies "Jason" as John Petree, Claimant acknowledges that this individual is not a PG&E employee and is a "Contractor." Moreover, the email at Exhibit C (Doc # 1415701, Page 10 of 54), makes no reference to PG&E, the project, the transmission lines, or any purported lowering of the transmission lines. The email refers to the "Parking area," and requests that "Mr. Jason Please make sure no one park or store any equipment in areas that are not leased to your company at any time."</p> <p>Sustained: _____ Overruled: _____</p>
Paragraph 6 at Exhibit E (Doc #14157-1 (page 19 of 54) and paragraph 7, at 4:4-8.	<p>FRE 602, Lacks Foundation/Personal Knowledge; FRE 801, Hearsay. Claimant admits that he never measured the height of any of the transmission lines so his declaration lacks foundation and is based on speculation.</p> <p>Sustained: _____ Overruled: _____</p>

Paragraph 8, at 4:-12 ("which I understood to mean that PG&E would continue with the implementation of the New Transmission Lines at their new locations and new heights over my objections.")	FRE 602/901, Lacks Foundation/Personal Knowledge/Authentication; FRE 801, Hearsay. The letter to Claimant at Exhibit F (Doc # 14157-1 (Page 21-54) refers to other emails and correspondence but makes no reference to Exhibit E; Claimant lacks foundation and speculates that Mr. Brady agreed with Claimant's unsubstantiated and hearsay assertion when Mr. Brady simply stated that PG&E's position was unchanged. Sustained: _____ Overruled: _____
Paragraph 9.	FRE 602/901, Knowledge/Authentication; FRE 801, Hearsay. The letter to Claimant at Exhibit F (Doc # 14157-1 (Page 21-54) refers to other emails and correspondence but makes no reference to Exhibit E; Claimant lacks foundation and speculates that Mr. Brady agreed with Claimant's unsubstantiated and hearsay assertion when Mr. Brady simply stated that PG&E's position was unchanged. Sustained: _____ Overruled: _____
Paragraph 10.	Claimant impermissibly attempts to resubmit his prior declaration. PG&E reasserts those objections previously lodged below. Sustained: _____ Overruled: _____

22 *Declaration of Amir Shahmirza in Support of Opposition to Counter-Motion for Summary
23 Judgment by PG&E [Docket No. 13654-1]*

Paragraph 3, at 2:18-21 (second ¶3), in its entirety.	FRE 602, Lacks Foundation/Personal Knowledge. Sustained: _____ Overruled: _____
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1	Paragraph 4, at 2:22-24, in its entirety.	FRE 602, Lacks Foundation/Personal Knowledge. Sustained: _____ Overruled: _____
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4	Paragraph 5, at 2:25-3:5, in its entirety.	FRE 602, Lacks Foundation/Personal Knowledge. Sustained: _____ Overruled: _____
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7	Paragraph 11, at 4:11-13.	FRE 801, Hearsay. Sustained: _____ Overruled: _____
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10	Paragraphs 16-20, at 5:3-20, In their entirety.	FRE 602, Lacks Foundation/Personal Knowledge; FRE 801, Hearsay. Sustained: _____ Overruled: _____
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14	Paragraph 21, at 6:1-16 (photo and description).	FRE 602, Lacks Foundation/Personal Knowledge/Authentication; FRE 801, Hearsay. Sustained: _____ Overruled: _____
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17	Paragraph 23, at 6:19-21, in its entirety.	FRE 602, Lacks Foundation. Sustained: _____ Overruled: _____
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21	Paragraphs 28 and 29, at 7:5-8, in their entirety.	FRE 602, Lacks Foundation/Personal Knowledge; FRE 801, Hearsay. Sustained: _____ Overruled: _____
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24	Paragraph 30, lines 9-10 "within approximately two (2) months of learning of the relocation and height alteration."	FRE 602, Lacks Foundation/Personal Knowledge/Authentication; FRE 801, Hearsay. Sustained: _____ Overruled: _____
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2 Dated: December 11, 2023
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**KELLER BENVENUTTI KIM LLP
ROVENS LAMB LLP
LAW OFFICES OF JENNIFER L. DODGE, INC.**

5 By: /s/ Steven A. Lamb
6 Steven A. Lamb
7 *Attorneys for Debtors and Reorganized Debtors*
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